

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

TWS FINANCIAL, LLC,

Defendant.

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) Case No. 13-01152-ess (SIPA)
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STIPULATION AND ORDER REGARDING DISCOVERY

The Securities Investor Protection Corporation (“SIPC” or the “Trustee”), as trustee for the liquidation of the business of TWS Financial, LLC (“TWS”), under the Securities Investor Protection Act of 1970, as amended, 15 U.S.C. §§ 78aaa–78lll (“SIPA”), and claimants Jerzy J. Mendelka, NDV Investment Company, Ryna Capital, Inc., and JM Property Sp.Z.O.O.Sp.K. (the “Claimants”), hereby stipulate and agree to the following schedule and procedures governing discovery related to the Claimants’ claims numbered 39, 40, 41, 43, 44, and 45 and *Opposition to Trustee’s Determination of Claims* [ECF No. 40], subject to approval and entry by the Court:

1. All discovery will be commenced in time to be completed by April 2, 2015.
2. The Trustee will serve discovery requests by October 23, 2014. Responses are due 45 days after service. Electronic files will be produced in native format.
3. The Trustee may submit a maximum of 25 interrogatories, including discrete subparts. Responses are due 45 days after service.
4. The Trustee may submit a maximum of 25 requests for admission. Responses are due 45 days after service.

5. The Trustee may request a maximum of five depositions. Each deposition will be limited to a maximum of seven hours (fourteen hours if a translator is needed) unless extended by agreement of the parties. The Trustee will provide at least 45 days' notice for each deposition. Depositions will be held in New York, NY, unless the parties agree to a different location.
6. Reports from retained experts are due January 30, 2015.
7. All potentially dispositive motions must be filed by May 1, 2015.
8. The Court will hold a pre-trial conference on January 22, 2015, at 3:00 pm at the United States Bankruptcy Court, 271-C Cadman Plaza East, Courtroom 3585, Brooklyn, New York, 11201, or at such other date, time, or location as the Bankruptcy Court may direct.

Dated: New York, NY
October 6, 2014

Dated: Washington, D.C.
October 6, 2014

LAW OFFICE OF ELZBIETA
KURKOWSKI, Attorney for Jerzy J.
Mendelka, NDV Investment Company, Ryna
Capital, Inc., and JM Property Sp.Z.O.O.Sp.K.

SECURITIES INVESTOR PROTECTION
CORPORATION, Trustee for the Liquidation
of TWS Financial, LLC

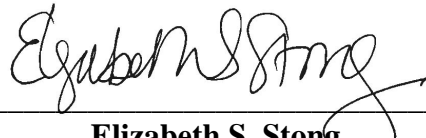
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IT IS SO ORDERED.

**Dated: Brooklyn, New York
October 6, 2014**




Elizabeth S. Stong
United States Bankruptcy Judge